

# **EXHIBIT F**

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**From:** Santhanam, Hari <hsanthanam@kirkland.com>  
**Sent:** Tuesday, July 26, 2016 8:55 AM  
**To:** Tiller, Steven  
**Cc:** Davis, Peter; Neuman, Barry S.; Rick Coughlin; Whit Pierce; Malloy, Emily N.; Levine, Russell E.; Baltzer, Kourtney  
**Subject:** RE: Tai He Deposition

Steven,

The first notice you provided regarding Willowood's attempts to seek a deposition of Mr. Wu was last Friday, just one week before the close of fact discovery. As you recognize, there is no possibility that his deposition can be completed before fact discovery closes. So that we can consider your eleventh hour request to depose Mr. Wu, please immediately produce all correspondence that Willowood or your firm has had with Mr. Wu or others at TaiHe in attempting to arrange the deposition.

Further, we note that Willowood has an existing relationship with TaiHe, who is Willowood's manufacturer and supplier of azoxystrobin. Yet, Willowood has not produced any documents from TaiHe, except for a single summary document on TaiHe letterhead that appears to be incomplete (WW000017-26). Thus, from an information perspective, any deposition of Mr. Wu at this late stage would be significantly one-sided, in Willowood's favor. Before Syngenta can agree to a deposition of Mr. Wu, we require that TaiHe produce at least the following categories of documents and information that we have already requested from Willowood:

- All documents and communications regarding the preparation of WW000017-26 (*see, e.g.*, RFP 26);
- TaiHe's process flow for manufacturing the azoxystrobin technical it supplies to Willowood, including all catalysts used and the amounts thereof (*see, e.g.*, Request for Production ("RFP") Nos. 4, 6; Interrogatory ("ROG") No. 1);
- All communications between Willowood and TaiHe regarding the manufacture or supply of azoxystrobin and any necessary reagents or process intermediates (*see, e.g.*, RFPs 4, 6, 26; ROGs. 1-2);
- All communications between Willowood and TaiHe regarding the patents-in-suit or this lawsuit (*see, e.g.*, RFPs 19, 27);
- All communication regarding discussions and negotiations leading up to the supply agreement in WW000017-16 (*see, e.g.*, RFPs 7, 26; ROGs 2, 10);
- All agreements and communications between TaiHe and any third parties (including Lianyungang Jinyang Chemical Co., Lianyungang Guosheng Chemical Co. Ltd.) regarding the manufacture or supply of any reagents or process intermediates to TaiHe (*see, e.g.*, RFPs 8, 26; ROGs 2, 10);
- All documents and communications, including any testing results, that form the basis of TaiHe's statements to Willowood that it does not use DABCO as a catalyst in manufacturing the azoxystrobin technical that it supplies to Willowood (*see, e.g.*, RFPs 4, 6, 28); and
- All documents and communications relating to the application for, and approval of, TaiHe's establishment registration with the EPA (*see, e.g.*, RFP 50).

Regards,

Hari

Hari Santhanam | Kirkland & Ellis LLP  
300 North LaSalle | Chicago, IL 60654  
(Tel) 312.862.7172 | (Fax) 312.862.2200  
[hari.santhanam@kirkland.com](mailto:hari.santhanam@kirkland.com)

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**From:** Tiller, Steven [mailto:stiller@wtplaw.com]  
**Sent:** Saturday, July 23, 2016 12:41 PM  
**To:** Santhanam, Hari  
**Cc:** Baltzer, Kourtney; Davis, Peter; Neuman, Barry S.  
**Subject:** Tai He Deposition

Hari: Please allow this email to confirm our conversation yesterday where I told you that Willowood is attempting to schedule the deposition of Tai He's President, Mr. Wu. As I told you, scheduling Mr. Wu's deposition has been complicated by time zone and translation challenges, the very serious health problems currently being suffered by Mr. Wu's father, and Chinese legal regulations prohibiting the deposition of Chinese citizens for use in foreign litigation thus necessitating Mr. Wu to travel outside of China for this deposition. After weeks of discussions, Mr. Wu has indicated that he should be able to travel to Hong Kong for a deposition sometime between August 1<sup>st</sup> and 10<sup>th</sup>. We have asked him to provide us with as many available dates as possible as soon as possible. I hope to have those dates to you early this week.

Finally, as I told you, we are happy to arrange for video conferencing in the event you or another attorney representing Syngenta wish to attend the deposition by video.

Steven E. Tiller



7 St. Paul Street | Baltimore, MD | 21202  
t: 410.347.9425 | f: 410.223.4325 |  
[stiller@wtplaw.com](mailto:stiller@wtplaw.com) | [Bio](#) | [vCard](#) | [www.wtplaw.com](http://www.wtplaw.com)

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